

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**GEORGE BOYD, *et al.*,
Individually and on behalf of
all others similarly situated,**

Plaintiff,

v.

**LAW OFFICES OF
SHAPIRO, BROWN & ALT, LLP, *et al.*,**

Defendants.

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Civil Action No: 3:12-cv-700-REP

DECLARATION OF CHRISTINE S. PATTERSON

I, Christine S. Patterson, declare under penalty of perjury, on this 20th day of December, 2012, that I have personal knowledge of the following matters and that they are true and correct to the best of my knowledge:

1. My name is Christine S. Patterson. I am a resident of Norfolk, Virginia. I am above the age of eighteen and am competent to testify to all matters contained herein.

2. I am currently employed by Shapiro, Brown & Alt, LLP ("SBA"), which is a law firm that practices primarily in the area of foreclosure.

3. I am familiar with the facts of the instant litigation between Plaintiffs, SBA and Professional Foreclosure Corporation of Virginia ("PFC") and have reviewed the Complaint.

4. As I understand it, the Complaint filed in this case makes allegations that the institutional practices of SBA and PFC are non-compliant with the FDCPA and Virginia state law. These claims include allegations that correspondence sent by SBA and PFC to borrowers

violated the FDCPA and Virginia law. I have first-hand knowledge concerning these claims as well as the defenses of SBA and PFC.

5. To the best of my knowledge, all correspondence to borrowers was sent from either Virginia Beach, Virginia, Fairfax County, Virginia, or Prince William County, Virginia.

6. At all times during the time frames alleged in the Complaint, I was employed by SBA in the Virginia Beach office and was an officer of PFC.

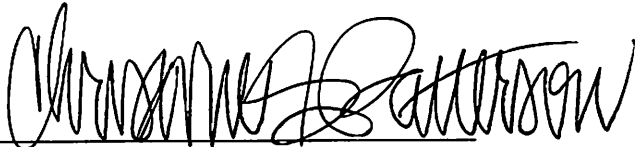
7. My job responsibilities as they relate to the allegations of the Complaint including crafting FDCPA policy and foreclosure procedures, processing files post-sale through completion that were sold to an outside third party, setting sale and publication dates and representing SBA's lender clients in bankruptcy proceedings.

8. The continued litigation of this case in the Richmond Division would create great hardships and inconveniences for me.

9. My work hours generally are 9:00 a.m. to 5:30 p.m. each weekday, with extended hours outside of normal business hours. I have federal bankruptcy court obligations that require my appearance in bankruptcy court between one and three days per week, as well as required state court appearances one to two days per week. In addition, I spend at least two days each week attending foreclosure sales. I am the primary bankruptcy attorney in the office and am responsible for ensuring all bankruptcy work is processed on a daily basis. These work obligations make it difficult for me to leave the office in the middle of a work day.

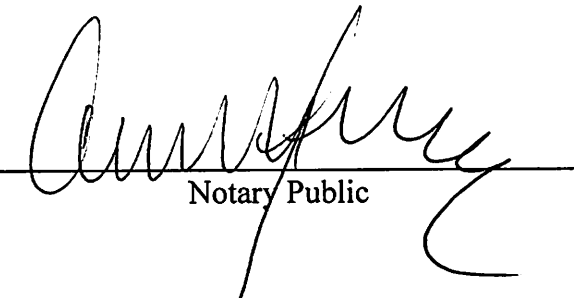
10. In addition, I have two school-aged children, ages 7 and 8, for whom I am the primary caretaker. I have no extended family to provide assistance to me in caring for them.

11. It will be extremely inconvenient and create undue hardship for me to leave my home and current job to travel to Richmond to attend pretrial and trial proceedings in this case.


Christine S. Patterson

COMMONWEALTH OF VIRGINIA,
CITY OF VIRGINIA BEACH, to wit:

The above Declaration was subscribed and sworn to (or affirmed) before me on this 20th day of December, 2012, by Christine S. Patterson, proved to me on the basis of satisfactory evidence to be the person who appeared before me.


Notary Public

My Commission Expires: 11/30/15
Registration Number: 7140720

